

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT PENNSYLVANIA**

KAREN AND MICHAEL MARTIN,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

KEYBANK NATIONAL ASSOCIATION,  
KEYCORP, and OVERBY-SEAWELL  
COMPANY,

Defendants.

Case No. 2:22-cv-1346

**DECLARATION OF CAREY ALEXANDER IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

I, Carey Alexander, provide this declaration in support of my motion for admission *pro hac vice* in the above-captioned action.

In support of the motion, I state as follows:

1. I am associated with the law firm of Scott+Scott Attorneys at Law LLP.
2. My email address is calexander@scott-scott.com.
3. My business address is 230 Park Avenue, 17<sup>th</sup> Floor, New York, New York 10169.
4. I am a member in good standing of the bar of the State of New York; admitted to practice in the United States District Courts for the Northern District of Illinois, Southern District of New York, Eastern District of New York, Western District of New York, Eastern District of Wisconsin, and the Districts of Colorado and Connecticut; and admitted to practice in the United States Court of Appeals for the Ninth Circuit.

5. My bar identification number is 5188461 (New York).
6. A true and correct copy of a certificate of good standing from the Supreme Court of New York is attached to this Declaration as Exhibit A.
7. I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
8. I have read, know and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 23, 2022

Respectfully submitted,

*s/ Carey Alexander*

Carey Alexander (*pro hac vice* forthcoming)

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*Counsel for Plaintiffs and the Proposed Class*

# EXHIBIT A



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

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*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*Carey Alexander*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **January 13, 2014**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of New York on  
March 2, 2022.*



*Susanna M. Rojas*

*Clerk of the Court*